

**WISCONSIN AIR POLLUTION
OPERATION PERMIT APPLICATION
INSTRUCTION BOOKLET**

FOR INITIAL OR RENEWAL APPLICATIONS

**PUB AM-300-99
VERSION 2.2**

**WISCONSIN DEPARTMENT OF NATURAL RESOURCES
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The first pages of these instructions are supplied on paper. You can find the full Instruction Book, which will assist you in filling out your application with form-by-form instructions, and blank copies of all the application forms (these are Word Perfect 5.1 files) if you wish to use paper forms, on our web site.

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INTRODUCTION

This booklet provides detailed instructions on how to apply for an Air Pollution Operation Permit. It explains who needs to apply, when the application is due, what needs to be included in the application, and how to fill out the forms. This booklet also contains specific examples of how to calculate emissions. Terms in ***bold italic*** are defined in **APPENDIX A**. Names of Department contacts are listed in **APPENDIX B**.

What is an Operation Permit?

An Air Pollution Operation Permit outlines all the air pollution requirements that apply to an individual facility. It contains emission limitations and operating conditions to ensure that the facility is in compliance with federal and state air pollution rules. Having a single document that outlines applicable requirements gives the facility, the state, the U.S. Environmental Protection Agency (US EPA), and the public a better picture of what is expected of the facility.

Why is there an Operation Permit Program?

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operation Permits, called ***part 70 source*** permits. Wisconsin has included requirements that some additional facilities which are not required to obtain a federal ***part 70 source*** permit, receive a state (***non-part 70 source***) permit. Descriptions of these types of permits are included beginning on page 3. You are still required to get a construction permit before beginning any new construction or modifications at your facility.

Application Time Line

All original operation permit applications for existing sources were due some time ago. For new sources, your operation permit application forms are due within 12-18 months prior to the expiration of your construction permit. Or if you were exempt from construction permit requirements, the operation permit is due prior to beginning construction of your new source. New sources will be issued operation permits as a revision of their existing operation permit. Renewal applications are due within 12-18 months prior to the expiration date of the existing operation permit. If you fail to submit a complete renewal application by the date exactly 12 months prior to your expiration date, you will no longer be authorized to continue operation of your facility when your permit expires. Any continued operation will be a violation of state and/or federal air pollution regulations.

Status of Your Current Permit

For any source with a permit about to expire, as long as you submit your operation permit application on time, the conditions and limitations of any current permits or orders you have continue to apply until you receive the renewed or revised Air Pollution Operation Permit. If you are applying for a renewal of your permit, specific instructions can be found on page 3 of this booklet.

Requirements for Permit Holders

Holders of an Air Pollution Operation Permit must:

- * Pay a fee based on the amount of air pollution they emit as required by s. 285.69, Wis. Statutes.
- * Report compliance status at least annually to the Department.
- * Implement a compliance monitoring program and report monitoring results to the Department.
- * Operate according to the conditions and limitations of the permit to maintain compliance with the applicable air pollution rules.

Failure to do any of the above could result in enforcement action taken by the State of Wisconsin. In the case of federal air pollution rules, if you are either a ***part 70*** or a ***synthetic minor, non-part 70 source***, it could also result in enforcement action taken by the US EPA or civil law suits by private citizens.

DETERMINE IF YOU ARE REQUIRED TO GET A PERMIT

All facilities are required to get an air pollution operation permit unless they are exempt. YOU MAY HAVE MADE OPERATIONAL CHANGES DURING THE PAST TERM OF YOUR OPERATION PERMIT THAT WOULD CHANGE YOUR PERMIT STATUS. You may wish to review the exemption criteria if you have made extensive operational changes, unless those changes were the direct result of complying with any applicable requirements (e.g., a federal MACT standard). There are two ways that your facility may be exempt from the requirement to obtain an air pollution operation permit. The first is if your facility consists of one of the **Specific Categories of Exempt Sources**. The second is if your facility meets all the criteria of the **General Category of Exempt Sources**. You DO NOT have to qualify for both categories to be exempt. You should also be aware that projects exempt from construction permit requirements per s. NR 406.04, Wis. Adm. Code, are not necessarily exempt from the requirement to obtain an operation permit.

IF YOU ARE APPLYING FOR A RENEWAL OF AN AIR POLLUTION OPERATION PERMIT, GO DIRECTLY TO PAGE 3 FOR INSTRUCTIONS ON HOW TO BEGIN COMPLETING THAT APPLICATION.

Specific Categories

If your facility consists solely of one of the **Specific Categories of Exempt Sources** listed in **APPENDIX C**, you are exempt. Certain combinations of sources are allowed under the Specific Categories and these are listed in #25 of **APPENDIX C**. Retain documentation of how you determined that your facility was exempt from the permitting requirements, as the DNR may request to see it at a later date. You may be required to maintain records of materials used, emissions, or production rates to demonstrate that your facility qualifies for the exemption. See the footnote in **APPENDIX C**. If your facility qualifies for this exemption YOU DO NOT NEED TO SUBMIT A PERMIT APPLICATION OR CONTINUE THROUGH THE STEPS OF THIS INSTRUCTION BOOKLET.

General Category

To determine if you are exempt under this category you must complete the following steps. RETAIN ALL INFORMATION YOU USE IN YOUR DETERMINATION. YOU WILL NEED THIS INFORMATION FOR YOUR PERMIT APPLICATION, IF ONE IS REQUIRED, OR TO DEMONSTRATE THAT YOU QUALIFY FOR AN EXEMPTION.

Step 1. Identify all the sources of air pollution at your facility, including *fugitive emissions*.

Step 2. Calculate the *maximum theoretical emissions* of each air contaminant from each *emissions unit*, operation and activity at your facility. Several resources that may assist you in calculating your emissions are listed in **APPENDIX D**. The air contaminants of concern are listed in Table 2 of ch. NR 407, Wis. Adm. Code (see the table as reprinted in **APPENDIX E**). *Maximum theoretical emissions* is defined and explained, and example calculations are given in **APPENDIX F**.

When calculating your *maximum theoretical emissions*, include all *fugitive emissions*. Do not calculate the emissions from the following insignificant sources:

1. Maintenance of grounds, equipment and buildings, including lawn care, pest control, grinding, cutting, welding, painting woodworking, general repairs and cleaning. However, DO include use of organic compounds used as clean-up solvents for processes;
2. Maintenance of boilers, turbines, generators, heating and air conditioning systems;
3. Pollution control equipment maintenance;
4. Internal combustion engines used for warehousing and material transport, forklifts and courier vehicles, front end loaders, graders and trucks, carts and maintenance trucks;
5. Fire control equipment;
6. Janitorial activities;
7. Office activities;
8. Convenience water heating;
9. Convenience space heating units with heat input capacity of less than 5 million BTU per hour that burn gaseous

- fuels, liquid fuels or wood;
10. Fuel oil storage tanks with a capacity of 10,000 gallons or less;
 11. Stockpiled contaminated soils;
 12. Demineralization and oxygen scavenging of water for boilers;
 13. Purging of natural gas lines; and
 14. Sanitary sewer and plumbing venting.

An ***emissions unit***, operation or activity at your facility also can be considered insignificant if the ***maximum theoretical emissions*** of each contaminant is less than the levels listed in Table 2 of ch. NR 407, Wis. Adm. Code (see **APPENDIX E**). Multiple emissions units, operations and activities that perform identical or similar functions (such as industrial space heaters) should be combined when determining whether a unit, operation or activity is insignificant.

The term “insignificant” can cause some confusion. It might suggest that you can disregard such emissions units altogether, but this may not be true. To know if you need a permit, you must know if air emissions from your entire facility are above certain limits. If your facility is close to any of the ***major source*** thresholds (see page 3 for Step 3 of that section), then contributions from the “insignificant” units could push the ***maximum theoretical emissions*** over the threshold. In that case it would be your responsibility to recognize the fact and apply for the correct type of permit. On the other hand, if it is obvious that you are below the ***major source*** threshold, you don’t need to waste your time calculating tiny numbers from “insignificant” sources. And, if you need a permit, you do not have to include such calculations in the application.

Step 3. Total the maximum theoretical emissions of each air contaminant from all significant ***emissions units***, operations and activities at your facility. Do not include the emissions from insignificant units in your calculation of total ***maximum theoretical emissions***.

Step 4. Compare your maximum theoretical emissions to the criteria for a general exemption listed in **APPENDIX C**. If the ***maximum theoretical emissions*** of any air contaminant from your entire facility are less than 5 times the level specified in Table 2, your facility is considered an insignificant source of that air contaminant and you do not need to compare your total ***maximum theoretical emissions*** of that contaminant to the criteria of the general category of exempt sources.

If your facility meets all the criteria for the **general category of exempt sources**, YOU ARE NOT REQUIRED TO SUBMIT A PERMIT APPLICATION OR CONTINUE THROUGH THIS INSTRUCTION BOOKLET. Retain documentation of how you determined that your facility was exempt from the permitting requirements, as the DNR may request to see it at a later date.

DETERMINE WHICH PERMIT YOU MUST OBTAIN

Now that you know you need a permit, you must determine which type of permit you are required to get. There are four different types of permits under the Air Pollution Operation Permit Program. If your operations have changed during the term of your existing operation permit, you may need to apply for a different type of operation permit. If your operations have NOT changed during the term of your existing operation permit, you may apply for the same type of permit as done previously.

1. A *part 70 source* permit
2. A *non-part 70 source* permit
3. A *synthetic minor, non-part 70 source* permit
4. A *general operation permit*

The content of the permit application, the review procedure and the filing date differ depending on the permit type. The types of permits are described in more detail below.

Facility Type

The type of permit you apply for depends on your facility type. There are several steps to determine your facility type, including: calculating your *potential to emit*, determining if you are a *major source*, and determining if you are a *part 70 source*. RETAIN ALL INFORMATION YOU USE IN YOUR DETERMINATION. YOU WILL NEED THIS INFORMATION FOR YOUR PERMIT APPLICATION.

Step 1. Calculate the potential to emit for each significant air contaminant emitted from each significant *emissions unit*, operation and activity at your facility. *Potential to emit* is defined and explained, and example calculations are given in **APPENDIX G**. Generally, the same *emissions units*, operations and activities you identified as insignificant when you determined that you needed a permit, are insignificant in this step also. In addition, any air contaminant emitted by your facility that you identified as insignificant when you determined that you needed a permit, are generally insignificant in this step also. You will need to consider insignificant sources and emissions only if excluding them would cause the facility to be classified as a minor source, but including them would cause the facility to be classified as a major source.

When calculating your *potential to emit*, do not include *fugitive emissions* in your calculations unless your facility belongs to one of the following categories:

1. All stationary source categories regulated by a New Source Performance Standard (NSPS) or a National Emission Standard for Hazardous Air Pollutants (NESHAPs); standards applicable under 40 CFR parts 60, 61 and 63. Fugitive emissions shall be considered only for those air contaminants that have been regulated for that category;
2. Coal cleaning plants with thermal dryers;
3. Kraft pulp mills;
4. Portland cement plants;
5. Primary zinc smelters;
6. Iron and steel mills;
7. Primary aluminum ore reduction plants;
8. Primary copper smelters;
9. Municipal incinerators capable of charging more than 250 tons of refuse per day;
10. Hydrofluoric, sulfuric or nitric acid plants;
11. Petroleum refineries;
12. Lime plants;
13. Phosphate rock processing plants;
14. Coke oven batteries;
15. Sulfur recovery plants;
16. Carbon black plants, furnace process;

17. Primary lead smelters;
18. Fuel conversion plants;
19. Sintering plants;
20. Secondary metal production plants;
21. Chemical process plants;
22. Fossil-fuel boilers, or combination thereof, totaling more than 250 million British thermal units per hour heat input;
23. Petroleum storage and transfer units with a total storage capacity exceeding 300,000 barrels;
24. Taconite ore processing plants;
25. Glass fiber processing plants;
26. Charcoal production plants; or
27. Fossil-fuel-fired steam electric plants of more than 250 million British thermal units per hour heat input.

Step 2. Total the potential to emit for each significant air contaminant emitted from all significant *emissions units*, operations and activities at your facility.

Step 3. Determine if your facility is a major source Compare your facility's total *potential to emit* to the criteria for a *major source* (see **APPENDIX H**). If you are not located in a nonattainment area, you are a major source if your facility's *potential to emit* is:

1. 100 tons per year or more of any air contaminant;
2. 10 tons per year or more of any single *hazardous air pollutant* listed in **APPENDIX I**; OR
3. 25 tons per year or more of any combination of the *hazardous air pollutants* listed in **APPENDIX I**.

If your facility is located in an ozone nonattainment area, your major source status is as follows (see **APPENDIX J**):

1. If your facility is located in a "marginal" or "moderate" ozone nonattainment area and your *potential to emit* is 100 tons per year or more of *volatile organic compounds* or nitrogen oxides, you are a major source.
2. If your facility is located in a "serious" ozone nonattainment area and your *potential to emit* is 50 tons per year or more of *volatile organic compounds* or nitrogen oxides, you are a major source.
3. If your facility is located in a "severe" ozone nonattainment area and your *potential to emit* is 25 tons per year or more of *volatile organic compounds* or nitrogen oxides, you are a major source.
4. If your facility's potential to emit from just significant sources is less than, but close to, any major source threshold you must determine whether including insignificant sources would cause the potential to emit to be above a major source threshold. If including insignificant emissions units, activities, or operations in calculating potential to emit makes the source a major source, you must include them.

Step 4. Determine if your facility is a part 70 source Your facility is a *part 70 source* if it falls into any of the following categories:

1. It is a *major source*;
2. Your facility is an electric utility affected by the acid rain provisions of the Clean Air Act. These sources have already been notified; OR
3. Your facility includes a solid waste incineration unit that has a maximum capacity greater than or equal to 250 tons per day.

Permit Type

If your facility is a **part 70 source**, you can apply for one of the following types of permits:

1. A **part 70 source** permit; OR
2. A **synthetic minor, non-part 70 source** permit if you qualify.

If your facility does not meet the criteria for a **part 70 source**, you are considered to be a **non-part 70 source** and you must apply for a **non-part 70 source** permit.

Both **part 70 sources** and **non-part 70 sources** can apply for a **general operation permit** if one has been developed for the type of operation in question (see page 8). A **general operation permit** can apply to an entire facility, a process line or a specific **emissions unit**.

Part 70 Source Permit

A **part 70 source** permit is designed to contain all applicable conditions and limitations. The US EPA will be involved in the review process, and the permits will be enforceable by US EPA, the State of Wisconsin, and any U.S. citizen. The permit application forms require more information than the forms used in the past. A **part 70 source** permit application must contain:

1. Identifying information, such as company name and address, and facility contacts.
2. Details on each significant **emissions unit**, operation and activity, including alternative operating scenarios.
3. Emission calculations.
4. Applicable federal and state limitations.
5. An indication of the facility's compliance status with each limitation.
6. A plan for coming into compliance or a commitment to remain in compliance with applicable limitations.
7. Methods of demonstrating compliance with applicable limitations.
8. A schedule for submitting compliance certification reports at least annually.
9. A signed certification of application completeness and accuracy, and of facility compliance status.

Part 70 source permit renewal applications must be submitted 12-18 months prior to expiration of any facility's existing operation permit.

All **part 70 sources** must apply for a **part 70 source** permit unless they are qualified to apply for a **synthetic minor, non-part 70 source** permit.

Synthetic Minor, Non-Part 70 Source Permit

Some **part 70 sources** may avoid certain **part 70 source** permit application requirements by becoming a **synthetic minor, non-part 70 source**.

A **synthetic minor, non-part 70 source** permit is a federally enforceable **non-part 70 source** permit. It will contain federally enforceable conditions that will limit your facility's **potential to emit** to levels that are less than the thresholds that make a facility a **major source**.

Be sure that if you propose special limitations to make your facility a **synthetic minor, non-part 70 source**, you can meet those limitations now and in the future (at a minimum the five year term of this permit). You want to retain future flexibility for growth. Violations of synthetic minor limitations are considered to be significant violations, subject to both Wisconsin and US EPA enforcement actions that could include civil and criminal prosecution, as well as citizen suits. Violations of these limitations could also make a facility a **part 70 source**. Continued operation of the facility would be a violation of the federal Clean Air Act and the facility could not legally continue to operate until it applies for and obtains a **part 70 source** permit.

To qualify to become a ***synthetic minor, non-part 70 source*** you must meet all of the following criteria:

1. Your facility must not be an electric utility affected by the acid rain provisions of the Clean Air Act. These sources have already been notified;
2. Your facility must not be a solid waste incineration unit which has a maximum capacity greater than or equal to 250 tons per day; AND
3. The actual emissions of each air contaminant emitted by your facility for the 2 most recent years prior to submitting your application must be less than the thresholds for a ***major source***.

If your facility does not meet all of the above criteria you must submit a ***part 70 source*** application by the ***part 70 source*** submittal date that applies to your facility.

To apply for a ***synthetic minor, non-part 70 source*** operation permit, you must:

1. Submit a complete application for a ***part 70 source*** operation permit.
2. Submit information to show that the actual emissions of each air contaminant emitted by your facility for the 2 most recent years prior to the submittal of the application were less than the thresholds for a ***major source***. If available, you must submit your actual emissions, as reported on the Air Emission Inventory for these 2 years.
3. Submit information to show that your facility meets the above criteria to be a ***synthetic minor, non-part 70 source***.
4. Propose federally enforceable limitations on your facility's ***potential to emit***. See **APPENDIX K**.

All ***synthetic minor, non-part 70 source*** permit renewal applications must be submitted 12-18 months prior to expiration of any facility's existing operation permit.

If you propose that your facility be considered a ***synthetic minor, non-part 70 source***, the Department will review your application and determine whether you have demonstrated that the above conditions have been met and whether your facility may be permitted as a ***synthetic minor, non-part 70 source***. If the Department determines that your facility can be permitted as a ***synthetic minor, non-part 70 source***, your application will be processed accordingly. If the Department determines that your facility cannot be permitted as a ***synthetic minor, non-part 70 source***, you will be notified and will have to submit a complete ***part 70 source*** permit application.

Non-Part 70 Source Permit

A ***non-part 70 source*** permit is designed to contain all applicable conditions and limitations. The permits will be enforceable by the State of Wisconsin. A ***non-part 70 source*** permit application must contain:

1. Identifying information, such as company name and address, and facility contacts.
2. Details on each significant ***emissions unit***, operation and activity, including alternative operating scenarios.
3. Emission calculations.
4. Applicable federal and state limitations.
5. An indication of the facility's compliance status with each limitation.
6. A plan for coming into compliance or a commitment to remain in compliance with applicable limitations.
7. Methods of demonstrating compliance with applicable limitations.
8. A schedule for submitting compliance certification reports at least annually.
9. A signed certification of application completeness and accuracy, and of facility compliance status.

The main difference between ***part 70*** and ***non-part 70*** applications is that ***non-part 70 sources*** can have less frequent

and/or less stringent periodic compliance demonstration methods. *Non-part 70 source* permit renewal applications must be submitted 12-18 months prior to expiration of any facility's existing operation permit.

General Operation Permits

A *general operation permit* can be issued to an entire facility, a process line or a specific *emissions unit*. *General operation permits* issued for process lines or *emissions units* can be included as part of the permit issued to an entire facility. These permits contain the same types of limitations and conditions as other permits, but the application and review process is substantially simplified. Both *part 70 sources* and *non-part 70 sources* can apply for *general operation permits* if the following criteria are met:

1. The facility, process line or *emissions unit* is one of the following:
 - * Degreasing operations
 - * Ethylene oxide sterilization systems
 - * Small heating systems
 - * Crushing operations
2. The facility is not a *part 70 source* that is submitting a *synthetic minor, non-part 70 source* permit application;
3. The facility, process line or *emissions unit* must be in compliance with all applicable limitations and requirements;
4. The facility, process line or *emissions unit* is not a *major source* subject to the requirements of ch. NR 408, Wis. Adm. Code for ozone nonattainment areas (see **APPENDIX J** for a description of the nonattainment areas in Wisconsin);
5. The facility, process line or *emissions unit* is not subject to the requirements of *Prevention of Significant Deterioration (PSD)*.
6. The facility, process line or *emissions unit* is not an electric utility affected by the acid rain provisions of the Clean Air Act;
7. If the facility, process line or *emissions unit's maximum theoretical emissions* of particulate matter are greater than 5.7 pounds per hour, then the facility must not be located in or impacting an area designated as nonattainment for particulate matter;
8. If the facility, process line or *emissions unit's maximum theoretical emissions* of sulfur dioxide are greater than 9.0 pounds per hour, then the facility must not be located in or impacting an area designated as nonattainment for sulfur dioxide;
9. The facility, process line or *emissions unit* does not have the potential to cause or exacerbate a violation of any ambient air quality standard or ambient air increment; AND

If your facility or a process line or *emissions unit* at your facility meets the above criteria and you wish to apply for a *general operation permit*, please contact the Bureau of Air Management at (608) 266-7718 to request the appropriate application forms. Any applications for *general operation permits* must be submitted 12-18 months prior to expiration of any facility's existing operation permit.

The Department retains the right to require any facility to submit a *part 70 source* or *non-part 70 source* permit application for their facility or any process lines or *emissions units* at their facility.

BASIC INFORMATION ABOUT THE PERMIT APPLICATION FORMS

Some background information is needed before you attempt to fill out the forms. Read this section carefully.

Applying for Confidentiality

All information submitted to the Department is part of the public record. The Department can keep confidential parts of your permit application except emissions data, if you demonstrate that the information is entitled to protection as a *trade secret*.

You must specifically identify all information in the permit application for which you are seeking confidential status. In addition to the copies of the complete application that are required, you must also supply the Department with 2 copies of the application with all confidential material deleted from forms and other materials which are submitted on paper. If you are submitting your application in electronic format, file one diskette with all confidential material deleted and one diskette that has it included.

1. To apply for confidential status you must submit a written application, in affidavit form, that includes the applicant name and address, the position of the individual filing, the specific type of information for which confidential status is sought, and the facts and supporting legal authority believed to constitute a basis for obtaining confidential treatment. For details on filing for confidential status, see s. NR 2.19, Wis. Adm. Code. Applying for confidential status will not delay the permit review process.

Forms

Figure out which forms you need to use based on the information below. The following is a list of all the permit application forms. The form numbers followed by an R are the ones that will need to be submitted on paper for Renewal applications and will appear differently in the electronic application software since the renewal changes haven't been made there yet.

Facility Summary Forms (Fill out one of each):

- 4530-100R Facility Identification
- 4530-101R Facility Plot Plan
- 4530-102R Source Site Description (-102, -102A, -102B)
- 4530-134R Index of Air Pollution Permit Application Forms

Stack Identification Form 4530-103 (Fill out one form for each stack that exhausts significant emissions.)

Emissions Unit Forms (Fill out one for each significant *emissions unit* at your facility):

- 4530-104 Boiler or Furnace Operations
- 4530-105 Storage Tanks
- 4530-106 Incineration
- 4530-107 Printing Operations
- 4530-108 Painting and Coating Operations
- 4530-109 Miscellaneous Processes

Control Equipment Forms (Fill out one for each piece of air pollution control equipment):

- 4530-110 Miscellaneous Control Equipment
- 4530-111 Condensers
- 4530-112 Adsorbers
- 4530-113 Catalytic or Thermal Oxidation
- 4530-114 Cyclones or Settling Chambers
- 4530-115 Electrostatic Precipitators
- 4530-116 Wet Collection Systems
- 4530-117 Baghouses and Fabric Filters

Compliance Demonstration Forms

- 4530-118 Compliance Certification - Monitoring and Reporting
- 4530-119 Continuous Emission Monitoring
- 4530-120 Periodic Emission Monitoring using Portable Monitors
- 4530-121 Monitoring Control System Parameters or Operating Parameters
- 4530-122 Monitoring Maintenance Procedures
- 4530-123 Stack Testing
- 4530-124 Fuel Sampling and Analysis
- 4530-125 Recordkeeping
- 4530-130 Current Emissions Requirements and Status of Unit
- 4530-131 Emission Unit Compliance Plan - Commitments and Schedule
- 4530-132 Current Emissions Requirements and Status of Facility
- 4530-133 Facility Requirement Compliance Plan

Pollutant Summary Forms (See instructions on individual forms):

- 4530-126 Emission Unit Hazardous Air Pollutant Summary
- 4530-127 Facility Hazardous Air Pollutant Summary
- 4530-128 Emission Unit Summary
- 4530-129 Facility Emissions Summary

Additional Information Form (4530-135) (Fill out as many as needed to supply extra information.)

Form Order

The forms are designed to be filled out in a certain order. Start by filling out the overall facility forms, 4530-100, -102 and then -101. Then fill out the stack identification form 4530-103 for your first stack and the forms for *emissions units* and control equipment related to this stack. Then fill out the *emissions units* pollution summary forms and compliance demonstration forms related to this stack. Repeat this for each stack at your facility. After completing all the stack identification and related forms, fill out the facility pollutant summary forms, the facility compliance status forms and the index. The following are examples of the order:

1. Coating operation with Catalytic Incinerator having two separate chambers (S01, S02, P01, C01, C02). For this example, this operation is a part 70 source.
 - a. stacks = S01 & S02: 1 form 4530-103 (refer to stack form instructions)
 - b. coating line = P01: 1 form 4530-108
 - c. catalytic incinerator = C01 & C02: 2 forms 4530-113
 - d. emission unit hazardous air pollutant summary for P01: 1 form 4530-126
 - e. emission unit summary for P01: 1 form 4530-128
 - f. emissions requirements and status of P01: 1 form 4530-130
 - g. compliance demonstration for P01: form 4530-118 and at least one of 4530-119 through -125.
 - h. compliance plan commitments and schedule for P01: form 4530-131
2. Foundry green-sand shake-out and no-bake shake-out lines connected to a baghouse (S10, P11, P12, C10). This foundry is a non-part 70 source.
 - a. stack = S10: 1 form 4530-103
 - b. green-sand shake-out and no-bake shake-out lines = P11 & P12: 2 forms 4530-109
 - c. baghouse = C10: 1 form 4530-117
 - d. emission unit hazardous air pollutant summary for P11 & P12: 2 forms 4530-126
 - e. emission unit summary for P11 & P12: 2 forms 4530-128
 - f. emissions requirements and status of P11 & P12: 2 forms 4530-130
 - g. compliance demonstration for P11 & P12: 2 forms 4530-118 and at least one of 4530-119 through -125 for each unit
 - h. compliance plan commitments and schedule for P11 & P12: 2 forms 4530-131
3. Boiler connected to a cyclone and a baghouse, in series, exhausting from one stack (S01, B01, C01, C02) and a metal parts degreasing unit (S02, F01). This is a part 70 source.
 - a. stack = S01 and S02: 2 forms 4530-103
 - b. boiler = B01: 1 form 4530-104
 - c. cyclone = C01: 1 form 4530-114
 - d. baghouse = C02: 1 form 4530-117
 - e. metal parts cleaner = F01: 1 form 4530-109
 - f. emission unit hazardous air pollutant summary for both B01 and F01: at least 2 forms 4530-126
 - g. emission unit summary for B01 & F01: 2 forms 4530-128
 - h. emissions requirements and status of B01 & F01: 2 forms 4530-130
 - i. compliance demonstration for B01: form 4530-118 and at least one of 4530-119, through -125.
 - j. compliance demonstration for F01: 1 form 4530-118 and at least one of 4530-119 through -125.
 - k. compliance plan commitments and schedule for B01: form 4530-131
 - l. compliance plan commitments and schedule for F01: form 4530-131

Completing a Renewal Application

If you were issued an Air Pollution Operation Permit approximately 3-4 years ago, you will need to begin working on a Renewal Application for that permit. The original permit is valid for a maximum of 5 years. You are receiving these instructions because it is nearing the time when you need to renew this permit.

There are two ways to submit your renewal application. First, you may submit a condensed application that only identifies that either there were no changes at your facility since the original operation permit was issued or the changes were approved under other permit processes and the department already has the documentation. Second, you may resubmit an entire operation permit application for your facility, similar to how you applied for your original operation permit. But at a minimum, you will need to submit the first five forms on paper since the renewal changes to the forms do not appear on the electronic permit system yet.

Forms 4530-100 through 4530-102B, 4530-134 and 4530-136 have been modified to include areas where you can identify the changes that have occurred during the term of your original operation permit, or that there were none. You will note whether or not the department has the documentation (construction permits or exemptions issued by the department) for the changes and the dates they were submitted. If no documentation was submitted to the department you will need to complete any applicable forms from 4530-101 through 4530-135 to provide that information with the renewal application. If you submit just those forms modified for the renewal applications the department will rely on your existing application in our files to perform the renewal application review for your current operations covered under the original operation permit. YOU WILL ALSO NEED TO SUBMIT THE CHECKLIST FROM **APPENDIX M** AND THE SUMMARY TABLE FROM **APPENDIX N** ON PAPER FOR ANY RENEWAL APPLICATION.

As a result of changes at your facility during the 5 year permit term, the status of your facility may have changed. **Appendix H** of these instructions defines the emission levels for a major source for Part-70. If the potential emissions from your facility have changed during the 5 year permit term, refer to that appendix to determine if your source status has changed. The method for calculating potential emissions is outlined in **Appendix G**. You can also refer back to page3 of this booklet to determine which permit to obtain.

Synthetic Minor or Non-Part 70 Sources Becoming Part-70 Sources

If you were originally issued either a synthetic minor, non-Part 70 source, or a non-Part 70 source operation permit, but you have since made changes at the facility that have increased emissions to the major source level, you will now need to update your application to meet all the requirements for Part-70 sources. At a minimum you need to complete forms 4530-118 through 4530-125 and 4530-130 through 4530-133. Any other applicable forms will need to be completed for any of these changes the department is not aware of yet.

Part 70 Sources Becoming Synthetic Minor, Non-Part 70 Sources

If you are a Part-70 major source under your current operation permit and wish to take restrictions to limit your emissions to levels below the major source levels, provide details on the restrictions you propose to take on form 4530-136. You need not complete forms exclusively for Part 70 Sources.

Part 70 Sources or Synthetic Minor Sources Becoming Non-Part 70 Sources

If your facility is a Part 70 source or a synthetic minor source and changes made during the permit term have permanently reduced your potential emissions to below the major source levels such that you become a non-Part 70 source, outline those changes in your renewal application. You need not complete forms exclusively for Part 70 Sources.

Sources Becoming Exempt from Operation Permit Requirements

If you have made changes at your facility that reduce the number and/or change the type of emissions units at your facility, or decrease your emissions to a level where your facility is now exempt from operation permit requirements, detail the changes in your renewal application and note the fact that you are now exempt from operation permit requirement on form 4530-136. **Appendix C** in this booklet outlines the categories of sources exempt from the operation permit program.

Alternative Operating Scenarios

While filling out your permit application, consider all the different operating scenarios you might want to operate under during the 5-year life of your permit. On some of the forms it is easy to address alternatives. For example, the printing form 4530-107 asks you to give information for all inks you currently use in your press and all inks you may want to use in the press for the next five years. Write "alternative" next to the inks that may be used in the future. Other forms don't lend themselves as easily to describing alternative operating scenarios. In this case, fill out a 4530-135 form for additional information to describe the alternative operating scenario.

Application Completeness

Be sure that all the appropriate blanks and forms are filled in. If you are using hard copy forms, you will have to do this check visually. Required fields are shaded on the hard copy forms. If you are using electronic forms, you can generate a completeness report to do this automatically. Note that on electronic forms, if you have indicated on form 4530-118 that you will fill out 3 Compliance by Recordkeeping forms (4530-125), the computer will have generated three forms. If you have only filled out 2 forms, the completeness check will catch this discrepancy and you will either have to change the number of forms needed or complete the third form.

The Department has 20 days from the date you submit your application to determine if your submittal is complete. You will be notified if the Department determines that your application is incomplete. You will then have 30 days to submit the missing information. The Department reserves the right to ask for additional information even after the application is initially deemed complete.

Submitting Your Permit Application

Submit the application to the following address.

Wisconsin Department of Natural Resources Bureau of Air Management AM/7 Operation Permit Team Leader P. O. Box 7921 Madison, WI 53707-7921
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You are required to submit a complete application by the specified due date as well as any additional information requested by the Department by the date specified. If you fail to do so, you will no longer be authorized to continue operating your facility. Any continued operation will be a violation of state air pollution regulations, subjecting you and your company to possible penalties, forfeitures, fines, and imprisonment. In addition, **part 70 sources** would be in violation of federal regulations and also subject to possible citizen suits. PERMIT APPLICATIONS ARE DUE 12-18 MONTHS PRIOR TO THE EXPIRATION DATE OF ANY FACILITY'S EXISTING OPERATION PERMIT.

APPENDIX M

CHECK LIST FOR RENEWAL APPLICATIONS

APPENDIX M

CHECK LIST FOR RENEWAL APPLICATIONS

Checklist for completion of Renewal Application Forms

YES	NO	Condition
		Changes or additions at the facility during the 5-year term since operating permit issuance.
		Electronic-permit software- forms completed.
		Electronic Word Perfect (or MS Word saved as a Word Perfect file) forms completed.
		For changes and additions to the facility, applicable forms were completed.
		Updated plot plan, if needed.
		Listed any construction (NSR) permits or permit exemptions issued during 5-year term.
		Listed any modifications or additions not requiring an NSR permit but requiring inclusion into the operating permit because maximum theoretical emissions exceed levels listed in s. NR 407.05, Wis. Adm. Code.
		Updated information and emission factors used to recalculate potential emissions, if applicable.
		Listed any new insignificant activity added during the 5-year permit term.
		For Part-70 sources - Documented any new applicable regulatory requirements (i.e. MACT, CAM, and any others).
		Signed Certification - This is required whether or not there were any changes at the facility.

If you have a Part 70 Operation Permit and operate any add-on control devices, you will now be required to meet the Compliance Assurance Monitoring (CAM) rule in 40 CFR Part 64. The rule requires that a CAM plan be submitted with your Title V renewal application for each pollutant at each emissions unit with a control device and has a potential to emit - prior to controls - of that pollutant greater than the major source threshold for the respective pollutant. Please refer to the CAM Technical Guidance web site at: <http://www.epa.gov/ttn/emc/cam.html> for further documentation on the rule and how to prepare a CAM plan for submittal with your renewal application.

APPENDIX N

TABLE SUMMARIZING CHANGES TO ORIGINAL OPERATION PERMIT APPLICATION

APPENDIX N

SUMMARY OF CHANGES TO ORIGINAL OPERATION PERMIT APPLICATION

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